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**UNITED STATES DISTRICT COURT
 DISTRICT OF NEVADA**

VERONICA THERESA RAMIREZ,

Plaintiff,

v.

MARTIN O'MALLEY,
 COMMISSIONER OF SOCIAL SECURITY,

Defendant.

)
)
) CASE NO.
) 2:23-cv-01885-GMN-EJY
)
) **UNOPPOSED MOTION**
) **FOR EXTENSION OF TIME TO FILE**
) **PLAINTIFF'S BRIEF**
)
)
)
)

Plaintiff, Veronica Theresa Ramirez, by her attorney, moves for a forty-six (46) day extension of time to file Plaintiff's opening brief by April 1, 2024. Plaintiff's opening brief is currently due to be filed February 15, 2024.

Counsel requests this extension due to multiple, simultaneous filing deadlines. Counsel requires additional time to properly and thoroughly prepare Plaintiff's brief. For instance, between February 5, and March 29, 2024, staff in Counsel's office have one hundred and twenty-three (123) Plaintiff briefs due. This figure does not include briefings which will be due after the filing of Administrative Records throughout this timeframe, Oral Arguments, appeals to Circuit Courts, Reply Briefs, settlement negotiations, and the various other tasks which arise throughout the course of litigation. These circumstances do not allow for Plaintiff's Counsel to properly

1 prepare the brief by the current deadline. This request will not cause Defendant any undue
2 hardship. This extension is needed to thoroughly and properly prepare the brief.

3 Wherefore, Plaintiff requests an extension from February 15, 2024, up to and including
4 April 1, 2024, to file her brief. Counsel for the Plaintiff has conferred with Defendant's Counsel
5 who kindly has no objection to this request.
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7 Dated February 5, 2024.

8 Respectfully submitted,

9 /s/Hal Taylor

10 Hal Taylor, Esq.

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12 **ORDER**

13 IT IS SO ORDERED.

14 IT IS FURTHER ORDERED that Plaintiff's Opening Brief is due April 1, 2024.

15 Dated this 5th day of February, 2024.

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18 U.S. MAGISTRATE JUDGE
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